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Attorneys for Defendants
SHERIFF MICHAEL HENNESSEY, CAPTAIN SABRINA BUTLER,
LIEUTENANT IMELDA JOHNSON, SERGEANT STEPHEN TILTON,
DEPUTY JAMALA SANFORD, DEPUTY JAVIER MIRAMONTES,
DEPUTY BEN FOSTER, DEPUTY JOHN MADDEN,
DEPUTY MELVIN SONG AND
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DENNIS ROZADILLA,

Plaintiff,

vs.

MICHAEL HENNESSEY, Sheriff of San
Francisco County; Deputy (fnu) WONG;
JOHN/JANE DOEs, Nos. 1-X (City and
County Employees), and The CITY &
COUNTY of SAN FRANCISCO,

Defendants.

Case No. 04-CV-00909-MEJ

**STIPULATION AND ~~PROPOSED~~ ORDER
SHORTENING TIME TO FILE MOTION
FOR SUMMARY JUDGMENT**

Date Action Filed: February 6, 2004
Trial Date: March 31, 2008

1 The parties and the Court have previously agreed that defendants' motion for summary
2 judgment will be heard on Thursday, March 13, 2008 at 10:00 a.m.

3 Counsel for the parties agree and stipulate that defendants can file their opening motion
4 and supporting papers by **Tuesday, February 12, 2008**, rather than on Thursday, February 7,
5 2008, the date that would provide the ordinarily-required 35-days notice under Local Rule of
6 Court 7-2(a). The parties further agree that plaintiff's opposition to defendants' summary
7 judgment motion can be filed by Monday, February 25, rather than Thursday, February 21, 2008,
8 the date that would provide the ordinarily-required 21-days notice under Local Rule of Court 7-
9 3(a). Defendants will still file their reply brief by February 28, 2008, in conformance with Local
10 Rule of Court 7-3(c).

11 This request is made because the parties have been intensively engaged in fact and expert
12 discovery, including taking the deposition of Jail Psychiatric Services staff member Nicole Tucci
13 on Thursday, February 7, 2008 in Fairfield, preparing for the disclosure of expert witnesses and
14 reports on Friday, February 8, 2008, taking the deposition of plaintiff's treating psychiatrist Dr.
15 Andre Zanger on February 11, 2008, and preparing and planning to take the depositions of
16 numerous other lay and expert witnesses.

17 There have been no other time modifications to this portion of the summary judgment
18 briefing schedule.

19 This request will have no impact on any other portion of the schedule of the case.
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1 The parties therefore jointly stipulate and request leave to shorten the time required to file
2 defendants' opening summary judgment motion and supporting papers as well as plaintiff's
3 opposition papers, as set forth above.

4 February 12, 2008

/s/

Robert A. Bonta
Attorney for Defendants
SHERIFF MICHAEL HENNESSEY,
CAPTAIN SABRINA BUTLER,
LIEUTENANT IMELDA JOHNSON,
SERGEANT STEPHEN TILTON, DEPUTY
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MIRAMONTES, DEPUTY BEN FOSTER,
DEPUTY JOHN MADDEN, DEPUTY
MELVIN SONG AND
CITY AND COUNTY OF SAN FRANCISCO

12 February 12, 2008

/s/

Dennis Cunningham
Attorney for Plaintiff
DENNIS ROZADILLA

17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 Dated: March 3, 2008

Honorable
United States District Judge

